

RYAN ALEXANDER, CHTD.  
3017 WEST CHARLESTON BOULEVARD SUITE 10, LAS VEGAS, NEVADA 89102

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Nevada Bar No. 10845  
RICHARD ENGLEMAN  
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*Attorneys for Plaintiff*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

SHANNON McMILLEN, an Individual and On  
Behalf of Others Similarly Situated;  
  
Plaintiff,

v.

LAS VEGAS METROPOLITAN POLICE  
DEPARTMENT, a Political Subdivision of the  
State of Nevada; CHARLES SMITH, an  
Individual; CITY OF BULLHEAD CITY, a  
Municipal Corporation in the State of Arizona;  
BULLHEAD CITY POLICE DEPARTMENT, a  
Political Subdivision of the State of Arizona;  
EDDIE ESPINOZA, an Individual; and DOES I-  
X, Unknown Persons or Entities;  
  
Defendants.

Case No.: 2:24-cv-415-RFB-MDC  
Hon. Richard F. Bouleware, II

**RYAN ALEXANDER, ESQ. AND RICHARD  
ENGLEMAN, ESQ.'S RENEWED  
MOTION TO WITHDRAW AS COUNSEL**

COME NOW Richard Englemann, Esq. and Ryan Alexander, Esq. of RYAN ALEXANDER, CHTD., and submit this motion to withdraw as counsel for the Plaintiff. This motion is based on the following points and authorities and the declaration of Ryan Alexander, Esq.

**POINTS AND AUTHORITIES**

D. Nev. L.R. IA 10-6 states that "No attorney may withdraw after appearing in a case except by leave of court after notice served on the affected client and opposing counsel." Rule 1.16(b) of the Nevada Rules of Professional Conduct states in pertinent part that an attorney may be allowed to withdraw from representing a client if:

- (1) Withdrawal can be accomplished without material adverse effect on the interests of the client;
- (2) The client persists in a course of action involving the lawyer's services that the lawyer reasonably believes is criminal or fraudulent;
- (3) The client has used the lawyer's services to perpetrate a crime or fraud;

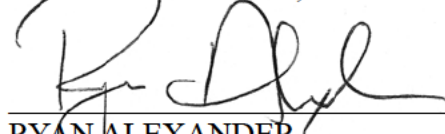
- (4) A client insists upon taking action that the lawyer considers repugnant or with which the lawyer has fundamental disagreement;
- (5) The client fails substantially to fulfill an obligation to the lawyer regarding the lawyer's services and has been given reasonable warning that the lawyer will withdraw unless the obligation is fulfilled;
- (6) The representation will result in an unreasonable financial burden on the lawyer or has been rendered unreasonably difficult by the client; or
- (7) Other good cause for withdrawal exists.

NRPC 1.16.

On May 1, 2025, Plaintiff indicated she wished to terminate the attorney-client relationship and for ALEXANDER and ENGLEMAN to withdraw. Counsel believes that withdrawal will not have a material adverse effect on the Plaintiff's claims as she continues to have LOUIS SCHNEIDER, ESQ. as counsel of record. Plaintiff was notified of Counsel's intention to withdraw and claim for lien for attorney's fees and costs to date. LOUIS SCHNEIDER, ESQ. will remain as her counsel of record and has the entire case file. For the above and foregoing reasons, Ryan Alexander, Esq. and Richard Englemann, Esq. respectfully request that they be permitted to withdraw as counsel for Defendant.

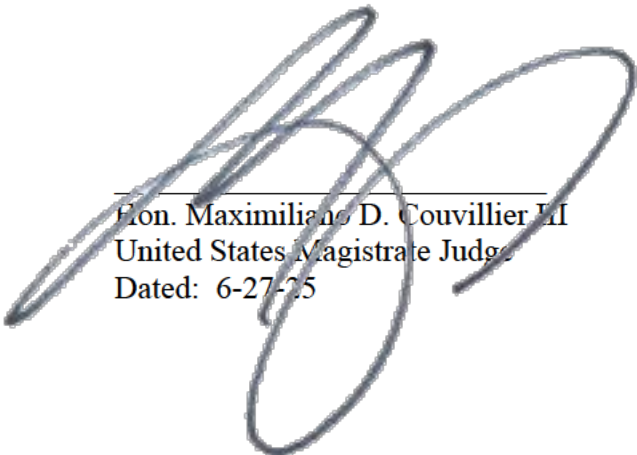
DATED this 16<sup>th</sup> of May, 2025.

RYAN ALEXANDER, CHTD.



RYAN ALEXANDER  
Nevada Bar No. 10845  
3017 West Charleston Blvd., Ste. 10  
Las Vegas, NV 89102  
*Attorney for Plaintiff*

**IT IS SO ORDERED.**



Hon. Maximiliano D. Couvillier III  
United States Magistrate Judge  
Dated: 6-27-25

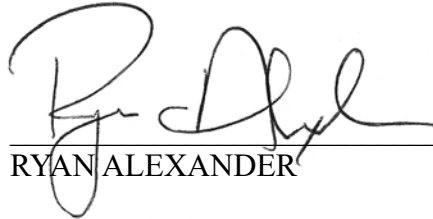
**SUPPORTING DECLARATION OF RYAN ALEXANDER**

RYAN ALEXANDER, being first duly sworn deposes and says:

1. I am an attorney at law duly licensed to practice in the State of Nevada and am counsel for the Plaintiff.
2. Withdrawal will not have a material adverse effect on McMILLEN's claims as she continues to have LOUIS SCHNEIDER, ESQ. as counsel of record.
3. McMILLEN indicated she wished to terminate the attorney-client relationship and for ALEXANDER and ENGLEMAN to withdraw.
4. McMILLEN was notified of Counsel's intention to withdraw and claim for lien for attorney's fees and costs to date.
5. LOUIS SCHNEIDER, ESQ. will remain as her counsel of record and has the entire case file.
6. Notice of this motion will be mailed to Plaintiff at  
SHANNON McMILLEN  
544 Thea St., Unit 1212  
Henderson, NV 89052-1566

Pursuant to NRS 53.045, I declare under penalty of perjury under the law of the State of Nevada that the foregoing is true and correct.

DATED this 1<sup>st</sup> of May, 2025.

  
\_\_\_\_\_  
RYAN ALEXANDER

RYAN ALEXANDER, CHTD.  
3017 WEST CHARLESTON BOULEVARD SUITE 10, LAS VEGAS, NEVADA 89102

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that pursuant to Fed. R. Civ. P. 5, I served via electronic service via CM/ECF a true and correct copy of the foregoing MOTION TO WITHDRAW AS COUNSEL addressed to:

☒ CM/ECF – Electronic service.

Daniel R McNutt drm@mcnuttlawfirm.com, lah@mcnuttlawfirm.com,  
mcw@mcnuttlawfirm.com

Lyssa S Anderson landerson@kcnvlaw.com, bjacobs@kcnvlaw.com, kkalkowski@kcnvlaw.com,  
rdaniels@kcnvlaw.com, wapplegate@kcnvlaw.com

Ryan Alexander ryan@ryanalexander.com, genesis@ryanalexander.com,  
jennifer@ryanalexander.com, monica@ryanalexander.com, richard@ryanalexander.com

☐ MAIL - by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at Las Vegas, Nevada addressed as set forth below.

SHANNON McMILLEN  
544 Thea St., Unit 1212  
Henderson, NV 89052-1566

☐ PERSONAL SERVICE - by personally delivering the document(s) listed above to the person(s) at the address(es) set forth below.

☐ OVERNIGHT COURIER - by placing the document(s) listed above in a sealed envelope with shipping prepaid, and depositing in a collection box for next day delivery to the person(s) at the address(es) set forth below via UNITED PARCEL SERVICE.

I declare under penalty of perjury under the laws of the State of Nevada that the above is true and correct.  
Executed on May 16, 2025 in Las Vegas, Nevada.

*/s/Ryan Alexander*

\_\_\_\_\_  
RYAN ALEXANDER  
*Attorney for Plaintiff*

RYAN ALEXANDER, CHTD.  
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